



[SEQ CHAPTER \h \r 1]External Meeting Request Form for OAR

Today's Date: February 10, 2022

Requesting Organization: **Ex. 4 CBI**

Title of the Meeting: Small Refiner Exemption Proposed Denial Under RFS

Purpose: Discuss Concerns and Impacts on **Ex. 4 CBI**

Background: In December 2021, EPA Proposed a Blanket Denial of all Small Refiner Exemptions Under the RFS Program. **Ex. 4 CBI** will present why a One Size Fits All Denial should not be applied and the impacts of such Proposed Denial on the Refinery, its employees and the local market at large.

Is this meeting related to ongoing litigation: No

Earliest possible date for the meeting: February 17, 2022

Last possible date for the meeting: Request meeting well in advance of the Agency Rendering any Final Decision on the Proposed Action. Preference, no later than March 11.

Is the meeting urgent and if so, why: Yes. The Agency is preparing to render a decision on the Above Referenced Proposed Denial of SRE and it is vital **Ex. 4 CBI** have the opportunity to discuss this prior to any decision being made.

Requested Time Length: 30 minutes to an hour

Have you met with anyone within EPA: Initial Discussion with OTAQ Staff in January to discuss the Proposed Denial. Our consultant had the initial discussion.

Have you met previously with OAR leadership on the topic? If yes, please explain any new information that will be presented: Yes. Janet Cohen. Our new information specifically responds to the Proposed Denial.

Invitees: Request Joe Goffman and any Staff he would like involved.

External Participants (to include email addresses):

Ex. 4 CBI

HYPERLINK

[HYPERLINK

Paul Argyropoulos, President Policy Nexus Advisors [HYPERLINK
"mailto:policynexusadvisors@gmail.com"]

Video Conference Required: Available for In person meeting, on-site if allowed. If not, preference would be a video conference.

Point of Contact for the Meeting: Paul Argyropoulos – Phone: 301-275-9462

Please email this form back to OAR_Invitations@epa.gov

Message

From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 8/20/2021 12:26:06 PM
To: Bunker, Byron [bunker.byron@epa.gov]; [Ex. 4 CBI]
CC: Cohen, Janet [cohen.janet@epa.gov]; Rakosnik, Delaney [rakosnik.delaney@epa.gov]; [Ex. 4 CBI]
[Ex. 4 CBI]
Subject: Re: IMPORTANT: SRE Meeting

Thank you Byron. Adding [Ex. 4 CBI] in on this now as well. Much appreciated.

Best Regards, Paul

Paul Argyropoulos
President
Policy Nexus Advisors
+1-301-275-9462
PolicyNexusAdvisors@gmail.com
www.linkedin.com/in/paul-argyropoulos-169b4020

On Fri, Aug 20, 2021, 7:39 AM Bunker, Byron <bunker.byron@epa.gov> wrote:

Hi Paul,

Thanks for calling this to our attention. My e-mail was intended to catch all of the refiners with refineries under 75,000 bpd. I will need to do a little checking to see if I missed any others.

I am adding Delaney Rakosnik to this e-mail response to have the [Ex. 4 CBI] team added to the invitation.

Thanks,

Byron

Byron Bunker (pronouns – he/him/his)
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
Mobile: (734) 353-9623

From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Sent: Friday, August 20, 2021 7:22 AM
To: Bunker, Byron <bunker.byron@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>
Cc: [REDACTED] **Ex. 4 CBI**
[REDACTED] **Ex. 4 CBI**
Subject: IMPORTANT: SRE Meeting

Good Morning Byron and Janet,

I hope all is well. I'm touching base with you regarding the upcoming August 25th meeting with EPA on SRE's. My Client, [REDACTED] **Ex. 4 CBI** falls within the universe of potential SRE petitioners however did not receive an invitation to the meeting. I'm sure that is a simple oversight. They wanted me to check in with you about getting on the list for this and any future meetings pertaining to this issue. Can you please add them and send an invitation directly to them? Their point of contact should be [REDACTED] **Ex. 4 CBI**
[REDACTED] **Ex. 4 CBI**

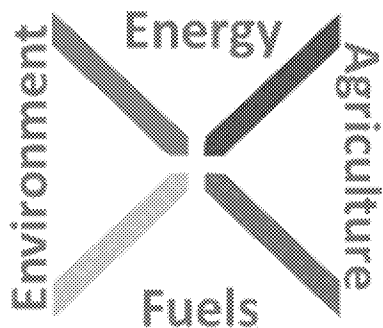
You can coordinate directly with her regarding their participation preferences for the call.

I'm also copying [REDACTED] **Ex. 4 CBI** just so they are in the loop. Please confirm receipt of this email and thank you for your help on this matter.

Take care and hope to talk to you soon.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

Message

From: Ex. 4 CBI
Sent: 8/23/2021 6:59:48 PM
To: Bunker, Byron [bunker.byron@epa.gov]
CC: Davis, Theresa [Davis.Theresa@epa.gov]; Cohen, Janet [cohen.janet@epa.gov]; Ex. 4 CBI
Ex. 4 CBI Paul Argyropoulos [policynexusadvisors@gmail.com]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]
Subject: RE: Meeting with EPA regarding Small Refinery Exemptions (8/25)

Much appreciated, Byron. We'll make that work.

Regards,

Ex. 4 CBI

CONFIDENTIAL

Ex. 4 CBI

From: Bunker, Byron <bunker.byron@epa.gov>
Sent: Monday, August 23, 2021 1:42 PM
To: Ex. 4 CBI
Cc: Davis, Theresa <Davis.Theresa@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>; Ex. 4 CBI
Ex. 4 CBI Paul Argyropoulos <policynexusadvisors@gmail.com>; Hengst, Benjamin <Hengst.Benjamin@epa.gov>
Subject: [EXTERNAL] RE: Meeting with EPA regarding Small Refinery Exemptions (8/25)

H Ex. 4 CBI

Thank you for following up on our meeting invitation. Rather than send Ex. 4 CBI and Paul meeting invitations (which would then display them as invited participants in the MS Team application), I am instead responding to this e-mail to provide you with a conference line for the meeting. The phone number that you call-in from will be displayed to other participants, but no name or other affiliation should be visible. I hope that is an acceptable way to have Ex. 4 CBI and Paul participate without identifying them to the other meeting participants.

The meeting is this coming Wednesday (8/25) from 2:30 to 4:00 PM EDT.

The conference line is:

Ex. 6 Personal Privacy (PP) United States, Washington DC
Phone Conference ID: **Ex. 6 Personal Privacy (PP)**

Thanks,

Byron

Byron Bunker (pronouns -- he/him/his)
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
Mobile: (734) 353-9623

From: **Ex. 4 CBI**
Sent: Monday, August 23, 2021 2:31 PM
To: Bunker, Byron <bunker.byron@epa.gov>
Cc: Davis, Theresa <Davis.Theresa@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>
Subject: RE: Meeting with EPA regarding Small Refinery Exemptions (8/25)

Byron,

The following people will participate for: **Ex. 4 CBI**

Ex. 4 CBI
Paul Argyropoulos, polycynexusadvisors@gmail.com

We request that our participation be without identification.

Thank you.

Ex. 4 CBI

CONFIDENTIAL

Ex. 4 CBI

From: Bunker, Byron <bunker.byron@epa.gov>
Sent: Monday, August 16, 2021 2:38 PM
To: Bunker, Byron <bunker.byron@epa.gov>
Cc: Davis, Theresa <Davis.Theresa@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>
Subject: [EXTERNAL] Meeting with EPA regarding Small Refinery Exemptions (8/25)

You are receiving this e-mail as a bcc because you have an association with one or more small refineries which may be eligible to seek an exemption from the RFS requirements under section 211(o)(9) of the Clean Air Act. EPA's Office of Air and Radiation has received a number of requests from small refineries, or their representatives, for a meeting to discuss the small refinery exemption program with Acting Assistant Administrator, Joseph Goffman. In response, we are organizing a group meeting using MS Teams for any small refinery or outside counsel representing them to meet with OAR Assistant Administrator Goffman.

We recognize that some parties have claimed their identities as small refinery exemption (SRE) petitioners to be confidential business information (CBI), and as such, may not wish to participate in such a meeting if doing so would reveal the existence of a SRE petition from the company. Understanding that, we are extending this invitation to the universe of potential SRE petitioners rather than limiting it to parties with currently pending petitions. Further, if a small refinery prefers to participate without identifying itself during the meeting, we will work to accommodate that request.

We also recognize that a group meeting will not allow small refineries to share specific CBI regarding any individual refinery. However, we believe it will be a good forum for small refineries to highlight the roles they play in their communities, the challenges that small refineries face in competing in the refining sector, and other experiences common to many small refineries. Petitioners should continue to communicate directly with EPA staff regarding the details of their petitions, as they have done in the past.

The meeting is scheduled for Wednesday, August 25 from 2:30-4:00 PM EDT. Please contact Byron Bunker, Bunker.Byron@epa.gov or (734) 353-9623, to confirm your intent to participate and to share contact information for the participants from your company. Please also share any recommendations that you may have for how the Agency can make this meeting most useful to small refineries. EPA participants are expected to include Assistant Administrator Goffman, Deputy AA for Mobile Sources Alejandra Nunez, representatives of EPA's Office of General Counsel and EPA's Office of Transportation and Air Quality. EPA is not extending this invitation to members of the press or other parties not representing small refineries.

Best regards,
Byron

Byron Bunker (pronouns – he/him/his)
Director Compliance Division

Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
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Message

From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 3/17/2022 4:39:08 PM
To: Bunker, Byron [bunker.byron@epa.gov]; Cohen, Janet [cohen.janet@epa.gov]; **Ex. 4 CBI**
Ex. 4 CBI McKenna, Chris [McKenna.Chris@epa.gov]; **Ex. 4 CBI**
Ex. 4 CBI; Miller, Meredith [Miller.Meredith@epa.gov]; Nelson, Karen
[nelson.karen@epa.gov]; Stahle, Susan [Stahle.Susan@epa.gov]
Subject: Thank You and Follow-Up

Byron and Team,

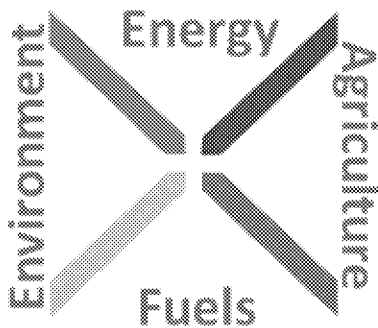
We want to thank you for your time today. We appreciated the opportunity to further detail the uniqueness of the **Ex. 4 CBI** SRE situation and provide some responses to your questions. Per our conversation, our team will prepare some additional information and get back to you as soon as possible. We hope to be able to pull together the information by the end of next week.

Again, please let us know if you have any additional questions. We'd be happy to reassemble the entire team for any follow-up.

Take care.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

Message

From: Ex. 4 CBI
Sent: 3/28/2022 11:06:56 PM
To: Bunker, Byron [bunker.byron@epa.gov]; Cohen, Janet [cohen.janet@epa.gov]; McKenna, Chris [McKenna.Chris@epa.gov]; Miller, Meredith [Miller.Meredith@epa.gov]; Nelson, Karen [nelson.karen@epa.gov]; Stahle, Susan [Stahle.Susan@epa.gov]
CC: Paul Argyropoulos [policynexusadvisors@gmail.com]; Ex. 4 CBI
Subject: RE: Thank You and Follow-Up
Attachments: ATT00001.txt

Hi Byron,

A couple answers to your questions:

Ex. 4 CBI

Hope this helps.

Ex. 4 CBI

CONFIDENTIAL

Ex. 4 CBI

From: Bunker, Byron <bunker.byron@epa.gov>**Sent:** Monday, March 28, 2022 12:48 PM**To:** Ex. 4 CBI Cohen, Janet <cohen.janet@epa.gov>; McKenna, Chris <McKenna.Chris@epa.gov>; Miller, Meredith <Miller.Meredith@epa.gov>; Nelson, Karen <nelson.karen@epa.gov>; Stahle, Susan <Stahle.Susan@epa.gov>**Cc:** Paul Argyropoulos <policynexusadvisors@gmail.com>; Ex. 4 CBI**Subject:** [EXTERNAL] RE: Thank You and Follow-UpDear Ex. 4 CBI

Thank you very much for following up after our call and sharing this information. I imagine our team may have multiple questions after reviewing, but I wanted to share the two that came to my mind when reviewing.

Ex. 4 CBI

Thanks,

Byron

Byron Bunker (pronouns – he/him/his)
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
Mobile: (734) 353-9623

From: Ex. 4 CBI**Sent:** Friday, March 25, 2022 4:06 PM**To:** Bunker, Byron <bunker.byron@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>; McKenna, Chris

<McKenna.Chris@epa.gov>; Miller, Meredith <Miller.Meredith@epa.gov>; Nelson, Karen <nelson.karen@epa.gov>;
Stahle, Susan <Stahle.Susan@epa.gov>

Cc: Paul Argyropoulos <polycynexusadvisors@gmail.com>

Ex. 4 CBI

Subject: RE: Thank You and Follow-Up

Byron and Team,

We've prepared some analyses to illustrate how some of the costs we discussed on our call last week impact

Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI

Again, we would like to express our sincere gratitude for your time and consideration with what is definitely a complex and politically charged issue. Hopefully the information we have provided is of use and do let us know if you have any questions or follow-up would be useful.

Ex. 4 CBI

CONFIDENTIAL

Ex. 4 CBI

From: Paul Argyropoulos <policynexusadvisors@gmail.com>

Sent: Thursday, March 17, 2022 12:39 PM

To: Bunker, Byron <bunker.byron@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>; James Chiu

Ex. 4 CBI

mckenna.chris@epa.gov;

Ex. 4 CBI

Ex. 4 CBI

miller.meredith@epa.gov; nelson.karen@epa.gov; stahle.susan@epa.gov

Subject: [EXTERNAL] Thank You and Follow-Up

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Take care.

Best Regards, Paul

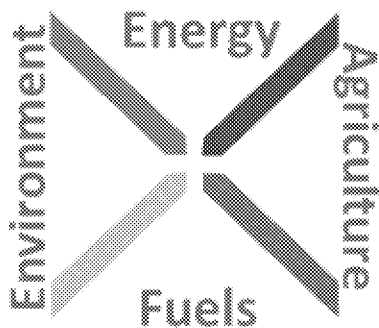
Paul N. Argyropoulos

President

Policy Nexus Advisors, LLC

Email: PolicyNexusAdvisors@gmail.com

Phone: 301-275-9462



Policy Nexus Advisors

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Message

From: Bunker, Byron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DDF7BCF023D241A9A477A2DC75D5901C-BUNKER, BYRON]
Sent: 9/1/2021 4:56:19 PM
To: Paul Argyropoulos [policyxexusadvisors@gmail.com]; **Ex. 4 CBI**
Ex. 4 CBI
Ex. 4 CBI Schmittou, Kim [schmittou.kim@epa.gov]
CC: Cohen, Janet [cohen.janet@epa.gov]; Nelson, Karen [nelson.karen@epa.gov]; McKenna, Chris [mckenna.chris@epa.gov]; Stahle, Susan [Stahle.Susan@epa.gov]
Subject: RE: Request for Follow-Up Meeting - SRE's

Hi Kim,

Can you please reach out to Paul (see his note below) to schedule the requested meeting? Please invite me along with the rest of the EPA staff on the cc list for this e-mail.

Thanks,

Byron

Byron Bunker (pronouns – he/him/his)
 Director Compliance Division
 Office of Transportation and Air Quality
 Environmental Protection Agency
 2000 Traverwood Drive
 Ann Arbor, MI 48105
Bunker.Byron@epa.gov
 Phone: (734) 214-4155
 Mobile: (734) 353-9623

From: Paul Argyropoulos <policyxexusadvisors@gmail.com>

Sent: Wednesday, September 01, 2021 12:49 PM

To: Bunker, Byron <bunker.byron@epa.gov>; **Ex. 4 CBI**

Ex. 4 CBI

Subject: Request for Follow-Up Meeting - SRE's

Hi Byron,

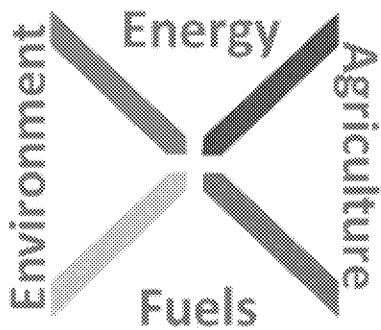
I hope all is well. Thanks again for getting the Team at **Ex. 4 CBI** set up to participate in last week's call on SRR's.

They would like to have a half hour call with you to provide some additional information and response / reactions to the information exchanged during the meeting. Can you offer some times that might work for you and your team either next week or the week following?

Thanks and I appreciate the assistance.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

Message

From: Bunker, Byron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DDF7BCF023D241A9A477A2DC75D5901C-BUNKER, BYRON]
Sent: 8/23/2021 6:41:56 PM
To: [REDACTED] Ex. 4 CBI
CC: Davis, Theresa [Davis.Theresa@epa.gov]; Cohen, Janet [cohen.janet@epa.gov]; [REDACTED] Ex. 4 CBI Paul Argyropoulos [policynexusadvisors@gmail.com]; Benjamin Hengst [Hengst.Benjamin@epa.gov]
Subject: RE: Meeting with EPA regarding Small Refinery Exemptions (8/25)

Hi [REDACTED] Ex. 4 CBI

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[REDACTED] Ex. 6 Personal Privacy (PP) United States, Washington DC
Phone Conference ID: [REDACTED] Ex. 6 Personal Privacy (PP)

Thanks,

Byron

Byron Bunker (pronouns – he/him/his)
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
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From: [REDACTED] Ex. 4 CBI
Sent: Monday, August 23, 2021 2:31 PM
To: Bunker, Byron <bunker.byron@epa.gov>
Cc: Davis, Theresa <Davis.Theresa@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>
Subject: RE: Meeting with EPA regarding Small Refinery Exemptions (8/25)

Byron,

The following people will participate for [REDACTED] Ex. 4 CBI

[REDACTED] Ex. 4 CBI

Paul Argyropoulos, polycynexusadvisors@gmail.com

We request that our participation be without identification.

Thank you.

Ex. 4 CBI

Ex. 4 CBI

CONFIDENTIAL

Ex. 4 CBI

From: Bunker, Byron <bunker.byron@epa.gov>
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Best regards,
Byron

Byron Bunker (pronouns – he/him/his)
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
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Message

From: Bunker, Byron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DDF7BCF023D241A9A477A2DC75D5901C-BUNKER, BYRON]
Sent: 3/28/2022 4:48:11 PM
To: [REDACTED] **Ex. 4 CBI** Cohen, Janet [cohen.janet@epa.gov]; McKenna, Chris [mckenna.chris@epa.gov]; Miller, Meredith [Miller.Meredith@epa.gov]; Nelson, Karen [nelson.karen@epa.gov]; Stahle, Susan [Stahle.Susan@epa.gov]
CC: Paul Argyropoulos [policynexusadvisors@gmail.com]; [REDACTED] **Ex. 4 CBI**
Subject: RE: Thank You and Follow-Up

Dear [REDACTED] **Ex. 4 CBI**

Thank you very much for following up after our call and sharing this information. I imagine our team may have multiple questions after reviewing, but I wanted to share the two that came to my mind when reviewing.

Ex. 4 CBI

Thanks,

Byron

Byron Bunker (pronouns – he/him/his)
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
Mobile: (734) 353-9623

From: [REDACTED] **Ex. 4 CBI**
Sent: Friday, March 25, 2022 4:06 PM
To: Bunker, Byron <bunker.byron@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>; McKenna, Chris <McKenna.Chris@epa.gov>; Miller, Meredith <Miller.Meredith@epa.gov>; Nelson, Karen <nelson.karen@epa.gov>; Stahle, Susan <Stahle.Susan@epa.gov>
Cc: Paul Argyropoulos <policynexusadvisors@gmail.com>; [REDACTED] **Ex. 4 CBI**
Subject: RE: Thank You and Follow-Up

Byron and Team,

We've prepared some analyses to illustrate how some of the costs we discussed on our call last week impact [REDACTED] **Ex. 4 CBI**

[REDACTED] **Ex. 4 CBI**

Ex. 4 CBI

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Ex. 4 CBI

Again, we would like to express our sincere gratitude for your time and consideration with what is definitely a complex and politically charged issue. Hopefully the information we have provided is of use and do let us know if you have any questions or follow-up would be useful.

Ex. 4 CBI

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Ex. 4 CBI

From: Paul Argyropoulos <policynexusadvisors@gmail.com>

Sent: Thursday, March 17, 2022 12:39 PM

To: Bunker, Byron <bunker.byron@epa.gov>; Cohen, Janet <cohen.janet@epa.gov>; **Ex. 4 CBI**

Ex. 4 CBI

mckenna.chris@epa.gov

Ex. 4 CBI

Ex. 4 CBI

miller.meredith@epa.gov; nelson.karen@epa.gov; stahle.susan@epa.gov

Subject: [EXTERNAL] Thank You and Follow-Up

Byron and Team,

We want to thank you for your time today. We appreciated the opportunity to further detail the uniqueness of the **Ex. 4 CBI** SRE situation and provide some responses to your questions. Per our conversation, our team will prepare some additional information and get back to you as soon as possible. We hope to be able to pull together the information by the end of next week.

Again, please let us know if you have any additional questions. We'd be happy to reassemble the entire team for any follow-up.

Take care.

Best Regards, Paul

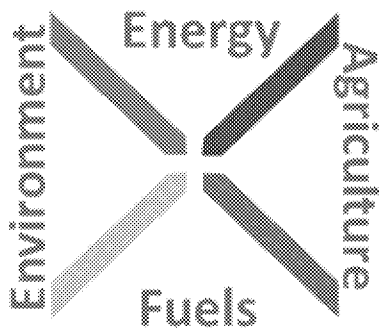
Paul N. Argyropoulos

President

Policy Nexus Advisors, LLC

Email: PolicyNexusAdvisors@gmail.com

Phone: 301-275-9462



Policy Nexus Advisors

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Do not open attachments or click on links unless you recognize the sender and know the content is safe.

Message

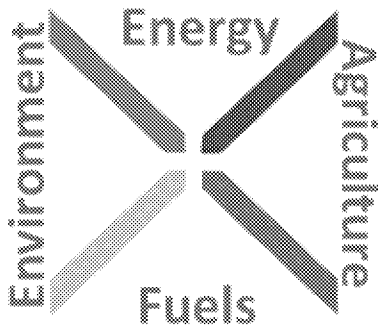
From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 5/27/2021 3:32:28 PM
To: Machiele, Paul [machiele.paul@epa.gov]
CC: Cohen, Janet [cohen.janet@epa.gov]
Subject: Re: Question on SRE / DOE Recommendation Disclosures

Thanks Paul. Janet, happy to chat through my question by phone too.

Hope you are well.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

On Thu, May 27, 2021 at 11:00 AM Machiele, Paul <machiele.paul@epa.gov> wrote:

No clue. Janet Cohen has lead the SRE team, so I'm copying her to see if see knows.

Paul

From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Sent: Thursday, May 27, 2021 10:14 AM
To: Machiele, Paul <machiele.paul@epa.gov>
Subject: Question on SRE / DOE Recommendation Disclosures

Hey Brother,

Hope all is well and you are ready for the start of summer.

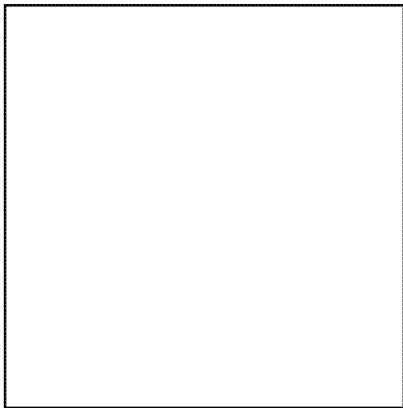
Quick question for you. Can SRE applicants request, either openly or under CBI, information about what the DOE recommendations were regarding their own refinery? A small refiner client would like to inquire and before they do I wanted to see if that is releasable information under any circumstances.

Thanks in advance. Hope things are settling down for you you guys alittle.

Take care.

Best Regards, Paul

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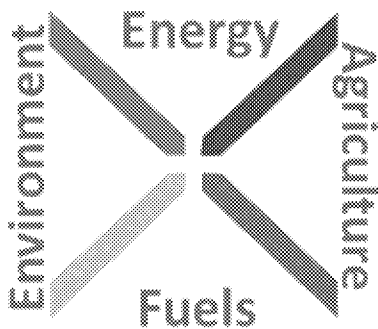
Message

From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 5/27/2021 8:04:49 PM
To: Cohen, Janet [cohen.janet@epa.gov]
CC: Machiele, Paul [machiele.paul@epa.gov]
Subject: Re: Question on SRE / DOE Recommendation Disclosures
Attachments: ATT00001.txt

Thanks Janet. I'll Ring you in the morning. Appreciate it. Look forward to speaking with you.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

On Thu, May 27, 2021 at 2:59 PM Cohen, Janet <cohen.janet@epa.gov> wrote:

Hey Paul, good to hear from you. Sure, probably best to talk so I have a better understanding of the request. I'm available this afternoon or tomorrow morning. Ex. 6 Personal Privacy (PP) – j. –

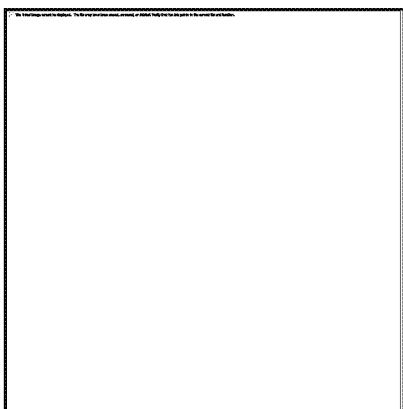
From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Sent: Thursday, May 27, 2021 11:32 AM
To: Machiele, Paul <machiele.paul@epa.gov>
Cc: Cohen, Janet <cohen.janet@epa.gov>
Subject: Re: Question on SRE / DOE Recommendation Disclosures

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Take care.

Best Regards, Paul

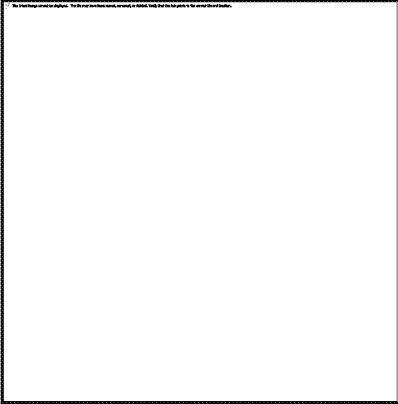
Paul N. Argyropoulos

President

Policy Nexus Advisors, LLC

Email: PolicyNexusAdvisors@gmail.com

Phone: 301-275-9462



Policy Nexus Advisors

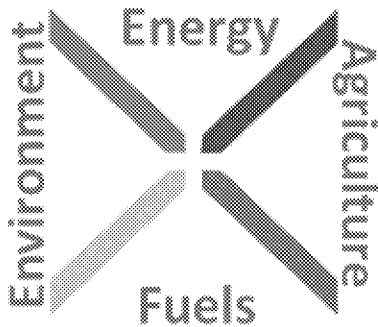
Message

From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 9/1/2021 4:49:16 PM
To: Cohen, Janet [cohen.janet@epa.gov]
Subject: Fwd: Request for Follow-Up Meeting - SRE's

Apologies Janet. I meant to include you on this message as well.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

----- Forwarded message -----

From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Date: Wed, Sep 1, 2021 at 12:48 PM
Subject: Request for Follow-Up Meeting - SRE's
To: Bunker, Byron <bunker.byron@epa.gov>

Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI

Hi Byron,

I hope all is well. Thanks again for getting the Team at Ex. 4 CBI set up to participate in last week's call on SRR's.

They would like to have a half hour call with you to provide some additional information and response / reactions to the information exchanged during the meeting. Can you offer some times that might work for you and your team either next week or the week following?

Thanks and I appreciate the assistance.

Best Regards, Paul

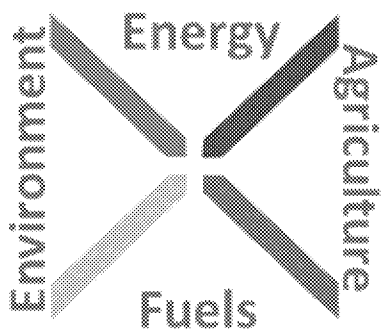
Paul N. Argyropoulos

President

Policy Nexus Advisors, LLC

Email: PolicyNexusAdvisors@gmail.com

Phone: 301-275-9462



Policy Nexus Advisors

Message

From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 12/8/2021 10:52:06 PM
To: Cohen, Janet [cohen.janet@epa.gov]
Subject: Re: RVO / SRE Proposals - Time to a Quick Call
Attachments: ATT00001.txt; ATT00002.txt

Hi Janet, thanks so much for getting back to me so quickly. I could chat at 930 tomorrow if that works for you. If not, let's set something up for Tuesday. Almost any time Tuesday works for me.

Best Regards, Paul

Paul Argyropoulos
President
Policy Nexus Advisors
+1-301-275-9462
PolicyNexusAdvisors@gmail.com
www.linkedin.com/in/paul-argyropoulos-169b4020

On Wed, Dec 8, 2021, 2:59 PM Cohen, Janet <cohen.janet@epa.gov> wrote:

Sure, happy to talk and at least get clear about what the questions are. When is good for you? I'm available still this afternoon or most of the day tomorrow. Then out until Tuesday. – j. -

From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Sent: Wednesday, December 8, 2021 9:41 AM
To: Cohen, Janet <cohen.janet@epa.gov>
Subject: RVO / SRE Proposals - Time to a Quick Call

Hi Janet,

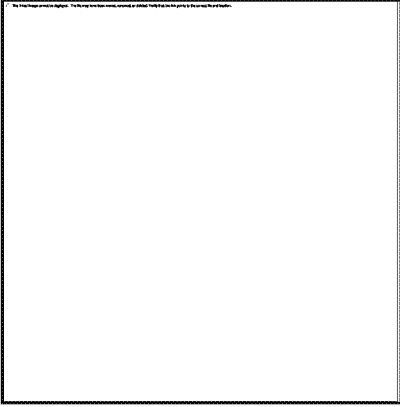
I hope all is well with you. The Holiday Season is upon us and as usual, never a dull moment with regulatory actions!

As you know, I've been helping support efforts with the Team at the Ex. 4 CBI and with the latest proposal and announcement (which I haven't reviewed thoroughly, I have a few questions on applicability. Can we set up a time to talk for a few minutes soon? I would love to get some clarification on a few things and get insight into what options are to proceed.

Thanks! And, Happy Holidays.

Best Regards, Paul

Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

Message

From: Paul Argyropoulos [policynexusadvisors@gmail.com]
Sent: 12/9/2021 12:46:59 PM
To: Cohen, Janet [cohen.janet@epa.gov]
Subject: Re: RVO / SRE Proposals - Time to a Quick Call

Thanks Janet. Let's wait until Tuesday. I'll send a calendar invite. I know you are likely crazed at this point. Frankly I am too! I'm still sifting through things too.

Thanks and I'll send an invite.

Best Regards, Paul

Paul Argyropoulos
President
Policy Nexus Advisors
+1-301-275-9462
PolicyNexusAdvisors@gmail.com
www.linkedin.com/in/paul-argyropoulos-169b4020

On Thu, Dec 9, 2021, 7:38 AM Cohen, Janet <cohen.janet@epa.gov> wrote:

Paul, I think I can do 9:30 but as you can imagine things around here aren't exactly calm so I'll need to confirm a little later this morning, ok? If not today, Tuesday early afternoon is good for me, say 1 or 1:30? Might have more info by then anyway. – j. -

From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Sent: Wednesday, December 8, 2021 5:52 PM
To: Cohen, Janet <cohen.janet@epa.gov>
Subject: Re: RVO / SRE Proposals - Time to a Quick Call

Hi Janet, thanks so much for getting back to me so quickly. I could chat at 930 tomorrow if that works for you. If not, let's set something up for Tuesday. Almost any time Tuesday works for me.

Best Regards, Paul

Paul Argyropoulos
President
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PolicyNexusAdvisors@gmail.com
www.linkedin.com/in/paul-argyropoulos-169b4020

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To: Cohen, Janet <cohen.janet@epa.gov>
Subject: RVO / SRE Proposals - Time to a Quick Call

Hi Janet,

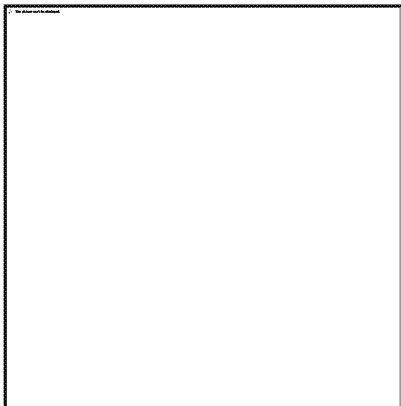
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Thanks! And, Happy Holidays.

Best Regards, Paul

Paul N. Argyropoulos
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Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462



Policy Nexus Advisors

Appointment

From: Google Calendar [calendar-notification@google.com]
Sent: 12/13/2021 9:17:44 PM
To: Cohen, Janet [cohen.janet@epa.gov]
Subject: Updated invitation: RVO / SRE - Check In @ Tue Dec 14, 2021 1:30pm - 2pm (EST) (cohen.janet@epa.gov)
Attachments: invite.ics
Start: 12/14/2021 6:30:00 PM
End: 12/14/2021 7:00:00 PM
Show Time As: Tentative
Recurrence: (none)

This event has been changed.

RVO / SRE - Check In

When Tue Dec 14, 2021 1:30pm – 2pm Eastern Time - New York

Joining info Join with Google Meet

Ex. 6 Personal Privacy (PP)

Calendar cohen.janet@epa.gov

Who

- policynexusadvisors@gmail.com - organizer
- cohen.janet@epa.gov

more details »

Changed: Paul Argyropoulos is inviting you to a scheduled Zoom meeting.

Topic: Paul Argyropoulos's Personal Meeting Room

Join Zoom Meeting

Ex. 6 Personal Privacy (PP)

Meeting ID: Ex. 6 Personal Privacy (PP)

Passcode: Ex. 6 Personal Privacy (PP)

- Does the EPA recognize that there are several small refineries that will not be able to continue to operate / are uneconomic without the SRE? The EPA's position that because RINS are a pass-through, so there isn't a disproportionate economic harm seems to ignore the relative costs of compliance for small vs. larger refineries/refinery companies. Specifically, these are large, real, fixed costs and investments (in assets and systems) that are required to support compliance. For bona fide small refineries, like Ex. 4 CBI there is less revenue as well as diversification to cover these costs

-

-

- If the EPA does not acknowledge/recognize this – is it then the case that the only thing that would convince is to see refineries shut down (i.e. laissez faire approach)? The reason for asking this question is that specific data / responses have been provided yearly by refineries like Ex. 4 CBI as part of the SRE petition process showing/explaining how necessary the SRE is in order to sustain operations

- Would the EPA consider an outcome where a certain number of SREs are granted for previous years and with some guidance on the go-forward? This question speaks to refineries like [Ex. 4 CBI](#) that were operating under extenuating circumstances, including being capital constrained, for 2020 (and much of 2021) with an expectation that the SRE would be granted but are only now finding otherwise.
- Does EPA have an approach to how they will handle SRE resubmissions for multiple compliance years for one refinery? Does EPA plan to review these resubmissions on a case by case basis at the compliance year level or on a refinery/facility level?
- Did EPA have any discussions surrounding grey areas they noted from the original SRE filings that refiner's should now take into consideration when filing the resubmissions?

Going (cohen.janet@epa.gov)? **[Yes](#) - [Maybe](#) - [No](#)** [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this courtesy email at the account cohen.janet@epa.gov because you are an attendee of this event.

To stop receiving future updates for this event, decline this event. Alternatively you can sign up for a Google account at <https://calendar.google.com/calendar/> and control your notification settings for your entire calendar.

Forwarding this invitation could allow any recipient to send a response to the organizer and be added to the guest list, or invite others regardless of their own invitation status, or to modify your RSVP. [Learn More](#).

Start: 12/14/2021 6:30:00 PM
End: 12/14/2021 7:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Ex. 6 Personal Privacy (PP) Does the EPA recognize that there are several small refineries that will not be able to continue to operate / are uneconomic without the SRE? The EPA's position that because RINS are a pass-through, so there isn't a disproportionate economic harm seems to ignore the relative costs of compliance for small vs. larger refineries/refinery companies. Specifically, these are large, real, fixed costs and investments (in assets and systems) that are required to support compliance. For bona fide small refineries, like Ex. 4 CBJ there is less revenue as well as diversification to cover these costs.

If the EPA does not acknowledge/recognize this - is it then the case that the only thing that would convince is to see refineries shut down (i.e. laissez faire approach)? The reason for asking this question is that specific data / responses have been provided yearly by refineries like Ex. 4 CBJ as part of the SRE petition process showing/explaining how necessary the SRE is in order to sustain operations.

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Do not edit this section of the description.

This event has a video call.

Join:	Ex. 6 Personal Privacy (PP)
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View your event at

Ex. 6 Personal Privacy (PP)

Message

From: Cohen, Janet [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D94B854E69CD4F9E80DB946BF9D1C1B2-COHEN, JANET]
Sent: 12/9/2021 12:51:38 PM
To: Paul Argyropoulos [policynexusadvisors@gmail.com]
Subject: RE: RVO / SRE Proposals - Time to a Quick Call

Very good. Talk next week, meanwhile have a great weekend Paul. – j. -

From: Paul Argyropoulos <policynexusadvisors@gmail.com>
Sent: Thursday, December 9, 2021 7:47 AM
To: Cohen, Janet <cohen.janet@epa.gov>
Subject: Re: RVO / SRE Proposals - Time to a Quick Call

Thanks Janet. Let's wait until Tuesday. I'll send a calendar invite. I know you are likely crazed at this point. Frankly I am too! I'm still sifting through things too.

Thanks and I'll send an invite.

Best Regards, Paul

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Thanks! And, Happy Holidays.

Best Regards, Paul

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President

Policy Nexus Advisors, LLC

Email: PolicyNexusAdvisors@gmail.com

Phone: 301-275-9462

Policy Nexus Advisors

Message

From: Cohen, Janet [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D94B854E69CD4F9E80DB946BF9D1C1B2-COHEN, JANET]
Sent: 12/14/2021 6:36:23 PM
To: Paul Argyropoulos [policynexusadvisors@gmail.com]
Subject: RE: RVO / SRE Proposals - Time to a Quick Call

Paul, I'm getting a "wait for host to start meeting" notice. If zoom isn't working and you still want to chat, please just call me on my mobile Ex. 6 Personal Privacy (PP) Thanks! - j. -

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Paul N. Argyropoulos
President
Policy Nexus Advisors, LLC
Email: PolicyNexusAdvisors@gmail.com
Phone: 301-275-9462

Policy Nexus Advisors

Appointment

From: policynexusadvisors@gmail.com [policynexusadvisors@gmail.com]
Sent: 12/9/2021 12:55:39 PM
To: policynexusadvisors@gmail.com; Cohen, Janet [cohen.janet@epa.gov]

Subject: RVO / SRE - Check In
Attachments: invite.ics

Start: 12/14/2021 6:30:00 PM
End: 12/14/2021 7:00:00 PM
Show Time As: Busy

Recurrence: (none)

This event has been changed.

RVO / SRE - Check In

When Tue Dec 14, 2021 1:30pm – 2pm Eastern Time - New York

Joining info Join with Google Meet

Ex. 6 Personal Privacy (PP)

Calendar cohen.janet@epa.gov

Who

- policynexusadvisors@gmail.com - organizer
- cohen.janet@epa.gov

more details »

Changed: Paul Argyropoulos is inviting you to a scheduled Zoom meeting.

Topic: Paul Argyropoulos's Personal Meeting Room

Join Zoom Meeting

Ex. 6 Personal Privacy (PP)

Meeting ID: Ex. 6 Personal Privacy (PP)

Passcode: Ex. 6 Personal Privacy (PP)

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- Did EPA have any discussions surrounding grey areas they noted from the original SRE filings that refiner's should now take into consideration when filing the resubmissions?

Going (cohen.janet@epa.gov)? **Yes - Maybe - No** [more options »](#)

Invitation from [Google Calendar](#)

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